

# **EXHIBIT 6**

Zvan Declaration



6. I recall that in connection with discussing speaking fees, Dr. Carrier advertised on his website that he lived in Northern California. When I checked the historical iterations of his website in preparing this declaration, I learned that this statement appeared on his website at least as recently as March 2016. A true and correct copy of the page as it appeared on March 22, 2016 according to the website archive.org is attached hereto as **EXHIBIT A**. Although the article suggests booking Dr. Carrier for speaking engagements “at least three months in advance, and preferably six months or more,” there is no mention that he would be moving from California.

7. There is also a widely-read article in which Dr. Carrier used his website to solicit a date. Again, this post mentioned living near Sacramento California. This article was published on richardcarrier.info on April 25, 2015. I have attached a true and correct copy hereto as **EXHIBIT B**.

8. Dr. Carrier also mentioned living and working in California in a July 8, 2011 post complaining about Amazon’s policy of charging sales tax to California residents. I have attached a true and correct copy of that post hereto as **EXHIBIT C**.

9. My belief that Dr. Carrier lived in California was also based on conversations I had with Orbit blogger Greta Christina, who lived in the San Francisco Bay Area and socialized with Dr. Carrier in the area, and also Heina Dadabhoy, who lives in Southern California but saw Dr. Carrier at events within the state of California.

10. I also believed Dr. Carrier lived in California because he worked with the head of Camp Quest in California. I learned this from the e-mail attached hereto as **EXHIBIT D**.

11. The first information I received that indicated Dr. Carrier may have moved to Ohio, was the fact that the lawyer who sent me the July 26, 2016 cease and desist letter attached to the Complaint as Exhibit 7 had an Ohio address. However, I did not know for certain that Dr. Carrier had moved to Ohio until I was served a copy of the Summons and Complaint in this matter.

12. I am part of a group of writer/contributor to a website located at the domain <the-orbit.net> which is a collective of social justice oriented bloggers.

13. The Orbit, which has only been in existence since March of 2016 has no formal structure. The focus of the website is on distributing information.

14. The Orbit is hosted on Amazon cloud servers.

15. The Orbit is not incorporated or otherwise organized in Ohio. It does not own any bank accounts or own and real property in Ohio.

16. The domain <the-orbit.net> was registered from within the State of Minnesota. Any funds held on behalf of the Orbit are held in a Minnesota bank account.

17. I am familiar with the allegations against Dr. Carrier, including the incidents I reported on in my article. There are six in total.

- a. One occurred at Skepticon in Missouri;
- b. One occurred after a Secular Student Alliance event at a location unknown to me;
- c. An incident that Dr. Carrier blogged about which took place at a location unknown to me;
- d. Incidents that occurred mostly through e-mail between Dr. Carrier when he was living in California and a woman who was also living in California;
- e. Incidents that occurred partially at a party in California and partially through e-mail between Dr. Carrier when he was living in California and a woman living in Minnesota; and
- f. The incident I referred to in my Facebook post which occurred in California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 12/1/2016

DocuSigned by:  
*Stephanie Zvan*  
5A330A285FF04F8...

Stephanie Zvan

**EXHIBIT A**

Webpage

INTERNET ARCHIVE  
**WayBackMachine**

52 captures  
21 Sep 08 - 27 Aug 16

http://www.richardcarrier.info/speaking.html

Go

FEB MAR APR  
**22**  
2015 2016 2017

## Booking Dr. Carrier

Unfortunately due to the increasing demands of work and income I can no longer speak for free. For any speaking engagement I usually require travel & lodging, a \$300 honorarium, and an opportunity to sell my books at your event. If you want to do a teleconference, I charge only \$150 (per hour), and no expenses. I also teach regular [courses online](#) for considerably less, though not live.

But here are some additional options and things to know...

- **The largest expense is always transportation.**

I live in California, an hour or two drive from the Sacramento, Oakland, San Jose, and San Francisco airports (and that's in order of proximity to me). Often the lowest expense is lodging. I prefer a nonsmoking room at any reasonable establishment. But if you can find volunteers to take me in, all I need is a warm bed and a hot shower. Be aware that I do sometimes travel with a girlfriend (though that requires no additional expense, it should be acceptable to anyone hosting me). If instead of flying you would like me to drive to you in my own car, I am happy to, but depending on circumstances I may have to charge 50 cents a mile (counting the distance only once, not round-trip). For any engagement (virtual or actual) I am also often unavailable, as my calendar fills quickly, so arrangements should be made at least three months in advance, and preferably six months or more. [Contact me](#) for negotiating a date and other essentials. You can also check my [Events Calendar](#) for availability.

- **How you can get me for less money.**

If you team up several organizations for a single joint event, or more, even over multiple nearby cities, you can reduce my fee and split costs as well. I am willing to stay several days for multiple events. You will have to board me for those extra nights, but you might also be able to split the airfare. Additionally, if I book more than one event in the same tour area my honorarium drops to \$200 per event (instead of \$300 for a single event). Informal events are always free (e.g. dinner parties, meet-and-greets, etc., where I don't have to give a formal speech or organize a workshop, etc.; ideal for fundraisers and membership drives). Just feed me copious amounts of alcohol. To give you an idea of how this can work, I once spoke at a university, the costs of which were split three ways by the campus freethought group and two different academic departments that were interested in the subject of my talk. On another occasion I spoke to two separate atheist community groups in cities near each other on different but proximate days, a



- **Values clause.**

I will not speak at events run by organizations hostile to my values. I must feel comfortable that you agree with promoting reasonableness, compassion, and integrity, and opposing sexism, racism, homophobia, and transphobia. I might make occasional exceptions for debates (e.g. if co-organized by an organization in line with my values) and interfaith venues (e.g. sincere efforts at seeking mutual participation & understanding).

- **If you've already booked me.**

If you've already booked me for an event and just need bios or photos see my [Publicity](#) page. If I have confirmed for the event, you have permission to use those materials however needed.

- **What topics I can speak on.**

If you do want to book me, please tell me what topics you want me to speak on. Find out what your group or audience is most keen to hear. I've delivered many public speeches to religious and freethought groups around the country since 1998.

I lecture on **critical thinking, historical method, the philosophy of naturalism, the intersection of humanism and feminism or polyamory, and ancient history**, especially **ancient science, technology, and religion**, and **the origins of Christianity**.

For an idea of where I've spoken recently (or soon will), and on what subjects, see my blog [[old](#) and [new](#)] and my [books](#). For other ideas browse my whole [website](#). For video and audio recordings of some of my past events see my [A/V Page](#).

But the following topics are my forte:

**General:**

- Ancient Roman science, technology, philosophy, and religion
- The philosophy of naturalism and the importance of naturalism as a worldview
- My experience with feminism, polyamory, or other social justice causes
- Historical method and what makes for a good historian
- Arguments for and against the resurrection of Jesus or the existence of God
- Christian apologetics and the skills and tactics of debate

**Specific:**



- Hitler's religious beliefs (my research [for GSR](#))
- The value of philosophy
- Critical thinking and/or Bayes' Theorem

I'm also willing to participate in formal debates. See my [Debate Requirements](#) page. You may also hire me for writing, consultation, teaching or research, but for that I'm expensive and rarely available.

**If you want to discuss booking me for any event or assignment please [contact me](#) by phone or text, especially if urgent. Although I prefer to communicate by email several months in advance.**

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**EXHIBIT B**

Article

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PUBLICITY



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ABOUT

GET  
BOOKS

TAKE  
CLASSES

HOW TO  
HELP

BOOKING DR.  
CARRIER

# Looking for a Date Middle of May

BY RICHARD CARRIER / ON APRIL 29, 2015 / 200 COMMENTS

So, this is experimental. I'd like to go on a date in May. And for the first time, I'm going to try a bat signal: putting a call out on my blog. I don't know anyone else who has tried doing that, so I have no precedent to

work from as to etiquette or even arguments for or against doing it. So I'm just going to do it and see what happens and document and assess. If you know anyone who might have an interest in dating me, let them know. If you might have an interest, read on.



- I'll start by making sure anyone considering this is up to speed. **I am polyamorous**. I currently have

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*Categories*

many girlfriends. All I consider my friends. Some are just occasional lovers. Some I am more involved with. They are also polyamorous, or near enough (not all of them identify that way, but all of them enjoy open relationships). And I will always have relationships with them, as long as they'll have me in their life.

- Many different things can be meant by the following terms, but just for the present purpose, if by a primary relationship is meant someone you live with or just about as good as live with, a secondary as someone you date regularly, and a tertiary as someone you date occasionally, all my relationships are tertiary, but only because of geography. I live just below Sacramento, California, where the rents are cheap, which means, where no one wants to live. And I'm unlikely to move anytime soon. So relationships with me, at best, are likely to be tertiary—long distance chatting with occasional being together throughout the year. Even so, I always take such friendships seriously.
- In person I am always very frank and open about myself and my life and wishes and feelings, and I prefer people be that way with me, although I fully understand most people aren't as fully comfortable doing that as I am.
- I travel North America *a lot*. So far, particularly to Southern California and Ohio. But I range far and wide in my adventures.

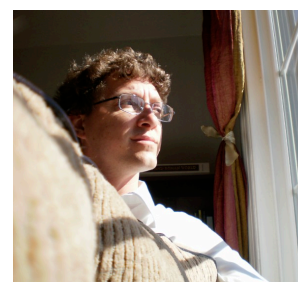
The rest you can find out by **googling me** (along with your preferred keywords). Or checking out my body of **writing** (even the writings of my enemies). But really, **my religious status is obvious. As are my politics.**

Select Category ▾

## Archives

Select Month ▾

## About The Author



Richard Carrier is the author of many books and numerous articles online and in print. His avid readers span the world from Hong Kong to Poland. With a Ph.D. in ancient history from Columbia University, he specializes in the modern philosophy of naturalism, humanism, and feminism, and the origins of Christianity and the intellectual history of Greece and Rome, with particular expertise in ancient philosophy,

**And social views.** I'm 0.5 on the **Kinsey scale**. Not heavy into kink (but get along well with people who are). I have an unusual fetish or two but don't expect any of my partners to share them. **I'm pro sex worker**, and though I personally find strip clubs and brothels uninteresting at best (uncomfortable at worst), I like partners who are or who have been sex workers. I also like women who have or pursue a lot of partners or who love to boast of their sexual exploits, especially over wine or whiskey or equivalent. I'm not going to get all butt-hurt or angsty over how high **Your Number** is. It very much has the opposite effect on me.

-:-

Okay. So if all *that* hasn't scared you away, read on. Otherwise, #RCIPNFY. Richard Carrier is probably not for you.

This May I will be in the Los Angeles area. I shall be spending time with several of my girlfriends, and family. But there is a hole in my schedule due to a date having fallen through, and I'm looking for someone to go on a date with then. It requires your taking at least one day off work (if you work a regular week). I'll be free between noon the Wednesday of May 13th to noon the Friday of May 15th.

Within that window I'm flexible, but here is the date I had in mind: I was originally going to take someone really excited by the opportunity to see the **Dead Sea Scrolls**, which are now on display at the California Science Center, and that is still my plan, especially as the same museum has the **Endeavor**, plus tons of other cool science stuff, from **aerospace** to **biospace**. We could definitely spend hours there if not a whole day.

I am also planning to have a hotel room, and am comfortable sharing it platonically. Certainly I would enjoy sharing it non-platonically, but I don't expect it. I can't believe (even though I know) there are still guys who assume the other shit buys them sex, thus necessitating I say this: if you are going to have sex with me, it has to be because it's fun and you want to, not because it's something you owe me. On the same understanding, if you have a place for me to crash in town (platonically or not), and are happy to have me over to spare me the cost of hiring a room, that would be lovely.

science and technology. He is also a noted defender of scientific and moral realism, Bayesian reasoning, and historical methods.

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And yes, if you are poly or open and live with a partner or two, I'm comfortable with that as well.

This also means you don't have to live in the LA area to join me for this. If you can get to LA, and don't mind sharing a room (at my expense), the opportunity remains.

But I can probably only fit one woman's company into my visit. And just as for you I'm sure, I'm only likely to say yes to someone who sparks something for me, and that's too subjective and idiosyncratic to predict or define. So for both reasons, please don't take a no badly. But if you want to at least inquire, please message me on **Facebook** ... or **email** if you are still that old school (hey, I can't complain, I still have a flip phone...well, and an iPad...it's a foot in both worlds for me). Just remember, it's an unfair advantage you knowing a lot about me and what I look like, and I not knowing the same, so please do remedy that information disparity, at least a little, first thing. I would very much appreciate it.

Okay. Bat signal engaged!

Now it only remains to see what happens.

-:-

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*including philosophy, ancient history, critical thinking, counter-apologetics, and social issues, including politics, feminism, and polyamory. Patrons may also message me on Patreon to make requests and recommendations for articles and topics to cover (or cover more often) or to pose questions for answering on my blog.*

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KATHERINE CROSS ON TONE

POLICING

DEBATE COURSE STARTS

TOMORROW!

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*200 comments*

JOE • APRIL 29, 2015, 6:25 AM

[Stock trolling remark deleted—RC]

REPLY

**EXHIBIT C**

Blog Post


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## Richard Carrier

Announcing appearances, publications, and occasional thoughts on natural philosophy and ancient history by philosopher, historian, and author Richard Carrier.

FRIDAY, JULY 08, 2011

### Amazon Dumps Us

Now that California has signed into law a tax reform that counts internet business associations as establishing legal "[nexus](#)" for state taxes to apply, Amazon has dumped all of its California internet sales associates. That means I can no longer earn a commission on referring you to Amazon to buy my books, or other books that I think are worth reading (which I had been doing in my [Richard Carrier Recommends](#) Amazon store, with my top recommendations in history and philosophy, as well as my favorite films and novels). This isn't because it costs Amazon anything (sales taxes are paid by the customer, not Amazon), but solely because Amazon wants to maintain it's edge in price competition with other vendors (like Barnes & Noble, which, having brick-and-mortar stores in California, already had nexus and thus was already paying California sales taxes on its internet sales).



I think that's lame. Amazon is actually going to lose a lot of business and market share to Barnes & Noble and other vendors, as Amazon's 10,000 abandoned sales associates in California switch to the competition, which I doubt is worth the tiny advantage they can offer in pricing. But there's nothing I can do about that. Except dump Amazon in return and associate with Barnes & Noble. Notably this switch has occurred in many other

### About Me



[Richard Carrier](#)  
California, United States

Writer of books & articles.  
Internet Infidel. Natural philosopher. Ph.D. in Greco-Roman intellectual history. Married. Coast Guard veteran. Graduate of Berkeley & Columbia. Not a frog.

[View my complete profile](#)

### Alert!

This blog has been discontinued. I have moved to [Freethought Blogs](#). Hop on over there to see what's new and subscribe to my new blog feed!

### Carrier Recommends

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[The Secular Web](#)

### Archives

- [2016](#) (1)
- ▼ [2011](#) (39)
  - [November 2011](#) (1)



states, due to similar laws passing all over (it's why the [Secular Web](#) was forced to switch to Barnes & Noble over a year ago). Even Texas forced Amazon to close a warehouse there after sticking them with a massive back-dated tax bill. And it seems apparent already that Amazon is actually starting to lose market share in the online book market, just when it had started to dominate there. If Amazon recognizes this grave error and comes back to California, I'll switch back to them, because I think Amazon is a superior service organization in every other way. But until then, I have relaunched my bookstore with links to Barnes & Noble, and will continue hereafter hyperlinking all books I recommend on my blog to Barnes & Noble.



So if you want to help support me, please don't be afraid to complete your purchases through Barnes & Noble when using my links and bookstore. Note that my commission comes out of their end, not yours, so you don't pay any more buying

through me. You pay exactly the same as if you came to Barnes & Noble yourself, so the fact that I get a kickback is purely a bonus result of buying from them when you click through me. With Amazon, the income I earned from this was small, but enough to buy a few books every month on the cheap (at Amazon!), and that's how I will likely use my Barnes & Noble money, too.

I can't afford the labor to go through my last 150+ blog entries and rewrite the URLs of all book links from Amazon to Barnes & Noble, so old blogs will still point to Amazon, and I just won't get any commission from those referrals. But I have updated all my permanent links (in the template and margins of my blog, and on my [official website](#)) and have created a new [Richard](#)

- ▶ [October 2011](#) (4)
- ▶ [September 2011](#) (3)
- ▶ [August 2011](#) (3)
- ▼ [July 2011](#) (3)
  - [The End of Christianity](#)
  - [Atheist Film Festival](#)
  - [Amazon Dumps Us](#)
- ▶ [June 2011](#) (3)
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**Carrier Recommends** bookstore, all linked up and ready to go. If you haven't perused that before, please do (I've also made a few additions). I apologize for the inconvenience of having to buy through B&N. But I sincerely thank you for all your support. Enjoy!

Posted by Richard Carrier at [10:53 AM](#)

Labels: [about](#), [Amazon](#)

**politics** (14) **publications** (18) [Quantum Mechanics](#) (1) **radio** (11) **replies** (20) **resurrection** (5) [Santa Claus](#) (1) **science** (7) **semantics** (4) **supernatural** (3) [Taoism](#) (1) **time** (1) [UFOs](#) (1) **updates** (15) [Vetrazzo](#) (2) **video** (12) [W.L. Craig](#) (4) **women** (3) [Yockey](#) (1)

### 6 comments:



**[curious cuber](#) said...**

Shit. My wish list on Amazon is HUGE! But if possible I will try to purchase through your B&N connection.

[July 08, 2011 5:36 PM](#)



**[Cameron](#) said...**

Why not place blame on the state government for passing the law? Amazon is merely reacting to it.

[July 08, 2011 7:09 PM](#)



**[Pikemann Urge](#) said...**

Slightly off-topic, but one of Amazon's mistakes was ditching their superior branding (of being 'Earth's biggest bookstore'). When your brand loses focus, it loses sales.

[July 09, 2011 2:57 AM](#)



**[Richard Carrier](#) said...**

**Cameron said...** *Why not place blame on the state government for passing the law? Amazon is merely reacting to it.*

Because the state law was correct and ought to have been passed (which is why similar laws are passing in states all over the country). It closed a loophole being exploited unfairly. Amazon should be paying sales tax on sales in states where it has nexus, just like everyone else. It's unfair otherwise, as then Amazon can avoid taxes its competitors can't.

Indeed, *Amazon isn't the one who has to pay the tax*. It simply has to collect the tax from Californians who buy on their site. So it's not even like it affects Amazon's bottom line. Their *only* reason for avoiding it is to try and get an edge in price competition.

Which in effect is cheating: companies in California have to pay the tax; so Amazon wants to "bootleg" goods into California to avoid that tax and thus get an unfair advantage. That's what this is, bootlegging. Alexander Hamilton made it his mission to fight bootlegging in every form, even establishing the Coast Guard as the first standing U.S. armed force specifically to combat it, and this fight was one of the primary concerns of all the Founding Fathers (contrary to idiots who think they were anti-tax).

This modern "mail order" bootlegging has since been tolerated in law on the grounds that it is unconstitutional for one state to force a company in another state to pay taxes on mail order goods (this was not the founders' intent, it's just an accidental byproduct of the commerce clause, which puts all interstate commerce in the jurisdiction of the federal government--so the federal government can tax interstate commerce, but the states themselves cannot).

So the workaround developed nationwide over the last two centuries has been that "nexus" removes the commerce clause provision from play, since taxes are then levied on the company *in the state they are in*. The way to abuse the commerce clause to avoid this fair taxation is to then have no established business reps in the state, thus preventing the state from enforcing its own tax laws.

The federal government could have remedied this absurd situation, but as we all know they rarely do what's right, they usually do what corporations like Amazon pay them to do, so they've sat on their asses, while states try to fend for themselves and close all the loopholes they constitutionally can. California is actually a latecomer to this trend.

Amazon is simply being a douchebag about it.

July 15, 2011 1:22 PM

Joe-sf said...

Would it be possible for you to use Powell's. It's privately owned and a great bookstore. I used to live in Portland and I try to buy from them whenever I can.

Anyway, just wondering.

July 22, 2011 6:20 PM

Richard Carrier said...

Do they have an online sales affiliate program?

August 04, 2011 11:38 AM

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**EXHIBIT D**

Email



Stephanie Zvan <stephanie.zvan@gmail.com>

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## Camp Quest and FtBCon

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**Richard Carrier** <rcarrier@infidels.org>

Sat, Jan 25, 2014 at 4:10 PM

Reply-To: FreeThoughtBlogs@googlegroups.com

To: FreeThoughtBlogs@googlegroups.com

I'll take it.

(Dave and I have worked together many times.)

But I don't see any open spots. Are you sure we want to force them in somewhere as a concurrent session? If yes, then I would slot them against Jewish atheism (6pm Central Saturday). Is that kosher? (Sorry, pun half-intended)

If I get the greenlight to take this, I will create and populate the Event and Lanyrd pages, and put it on the spreadsheet (although that's starting to become obsolete).

Good?

On Saturday, January 25, 2014 1:54:46 PM UTC-8, stephanie.zvan wrote:

Dude, you're more booked than I am. You can have it if no one else wants it, but don't burn yourself out.

On Sat, Jan 25, 2014 at 3:47 PM, Jason Thibeault <ja...@lousycanuck.ca> wrote:

I'll take this, but I'll need to set up a slot for him.

On Sat, Jan 25, 2014 at 3:33 PM, Stephanie Zvan <stephan...@gmail.com> wrote:

This looks essentially ready to go when we assign it a host. Is anyone excited by it and have some time? There are a couple of slots I could fit it into, but my schedule is getting pretty full. That is, I'll take it if no one else does, but I'm hoping someone less busy will.

----- Forwarded message -----

From: **David Diskin (CQW)** <david....@campquest.org>

Date: Sat, Jan 25, 2014 at 3:26 PM

Subject: Camp Quest and FtBCon

To: stephan...@gmail.com

Stephanie,

Hello! I'm the president of Camp Quest West (California).

I skimmed through the speakers that Richard recently posted, and didn't see anyone there from Camp Quest.

I'd be happy to speak for a while about CQ and what we do, and/or answer questions. I can show photos/videos from prior years, talk about our curriculum, etc. I've given many similar talks to local organizations, campuses, and meetups.

If you think that's something that would be of benefit to FtBCon, and if someone isn't already talking about CQ, please let me know.

I've looked at my schedule and am available in the evenings (PST) of Jan 31, Feb 1, and all day on Feb 2.

Thanks so much,

-David Diskin

President, Camp Quest West

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[Quoted text hidden]